

1 **SAO**  
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14 Attorneys for Defendant, TARGET CORPORATION

15  
16 UNITED STATES DISTRICT COURT

17 DISTRICT OF NEVADA

18 LELA MCGEE, individually,

19 Plaintiff,

20 v.

21 TARGET CORPORATION; DOES 1-V; and  
22 ROE CORPORATIONS II-V, inclusive,

23 Defendants.

CASE NO.: 2:20-cv-00345-KJD-EJY

**STIPULATION AND ORDER TO  
CONTINUE TRIAL**

24 Plaintiff, LELA McGEE, by and through her counsel of record, JUSTIN G. RANDALL, ESQ.,  
25 of ER INJURY ATTORNEYS and Defendant, TARGET CORPORATION, by and through its  
26 counsel of record, LOREN S. YOUNG, ESQ. and KARISSA K. MACK, ESQ., of the law firm  
27 LINCOLN, GUSTAFSON & CERCOS, LLP, hereby stipulate and request that the Court move the  
28 trial stack by approximately one hundred twenty (120) days. Pursuant to the Court's minute order  
dated January 18, 2023, the parties have met and conferred regarding trial in this matter scheduled for  
February 27, 2023 and considered the Court's master trial list, and, therefore that parties stipulate to  
continue trial to allow continuing negotiations and considering a proposal for binding arbitration.

Pursuant to Local Rules 6-1 and 26-3, and for good cause as set forth, discovery is completed  
and there is no further discovery that needs to be completed.

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**Proposed Schedule for Continuing Trial:**

WHEREFORE, the parties request that this Court Continue Trial as follows:

Scheduled Event	Current Deadline	Proposed Deadline
Calendar Call	February 21, 2023	<b>June 21, 2023</b>
Trial	February 27, 2023	<b>June 27, 2023</b>

DATED this 1<sup>st</sup> day of February, 2023.

DATED this 1<sup>st</sup> day of February, 2023.

**LINCOLN, GUSTAFSON & CERCOS**

**ER INJURY ATTORNEYS**

*/s/ Karissa K. Mack, Esq.*

*/s/ Justin G. Randall, Esq.*

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Attorneys for Plaintiff,

Las Vegas, Nevada 89128

LELA MCGEE


Attorneys for Defendant, TARGET

CORPORATION

**ORDER**

IT IS ORDERED that jury trial currently scheduled for February 27, 2023 is hereby vacated and continued to June 5, 2023 at the hour of 9:00 a.m. in courtroom 4A and calendar call currently scheduled for February 21, 2023 be vacated and continued to May 30, 2023 at the hour of 9:00 a.m. in courtroom 6B.

Dated this 6th day of February, 2023.



United States District Judge

**From:** [Justin Randall](#)  
**To:** [Loren Young](#)  
**Cc:** [Cheryl Giammona](#); [Karissa Mack](#)  
**Subject:** Re: McGhee v. Target  
**Date:** Wednesday, February 1, 2023 10:32:12 AM

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Ha. I'm good with this. You may use my e-signature.

On Wed, Feb 1, 2023 at 10:26 AM Loren Young <[lyoung@lgclawoffice.com](mailto:lyoung@lgclawoffice.com)> wrote:

I made reference to the Court's order so hopefully it sounds like we are "considering" what they want us to do

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**From:** Cheryl Giammona <[CGiammona@lgclawoffice.com](mailto:CGiammona@lgclawoffice.com)>  
**Sent:** Wednesday, February 1, 2023 10:24 AM  
**To:** Justin Randall <[justin@erinjuryattorneys.com](mailto:justin@erinjuryattorneys.com)>  
**Cc:** Karissa Mack <[kmack@lgclawoffice.com](mailto:kmack@lgclawoffice.com)>; Loren Young <[lyoung@lgclawoffice.com](mailto:lyoung@lgclawoffice.com)>  
**Subject:** RE: McGhee v. Target

Good Morning Mr. Randall!

Loren made a couple changes with the stipulation and order, I have attached it above. Please let us know if we have your approval for an e-signature and we can get this submitted today.

## Cheryl Giammona

*Legal Assistant to*

**Loren S. Young, Esq. – Managing Partner**

**Karissa K. Mack, Esq. – Partner**

**LINCOLN, GUSTAFSON & CERCOS LLP**

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**From:** Justin Randall <[justin@erinjuryattorneys.com](mailto:justin@erinjuryattorneys.com)>  
**Sent:** Tuesday, January 31, 2023 2:56 PM  
**To:** Cheryl Giammona <[CGiammona@lgclawoffice.com](mailto:CGiammona@lgclawoffice.com)>  
**Cc:** Karissa Mack <[kmack@lgclawoffice.com](mailto:kmack@lgclawoffice.com)>  
**Subject:** Re: McGhee v. Target